

THE HONORABLE JAMAL N. WHITEHEAD

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

IN RE VALVE ANTITRUST LITIGATION

Civil Action No. 2:21-cv-00563-JNW

DECLARATION OF CARA WALLACE
IN SUPPORT OF MICROSOFT'S
RESPONSE TO VALVE
CORPORATION'S MOTION TO SEAL

I, Cara Wallace, declare the following:

1. I am an attorney at the law firm Perkins Coie LLP and counsel to Microsoft Corporation ("Microsoft"). I am a member in good standing of the State Bar of Washington. The facts stated in this declaration are based on my own personal knowledge and, if called as a witness, I could and would testify to those facts.

2. I submit this declaration in support of Microsoft's response to Valve's motion to seal in the above-captioned litigation.

3. The bolded information in Exhibit A to the Second Declaration of Adam Fossa dated August 20, 2025 in Support of Microsoft's Response to Valve Corporation's Motion to Seal

1 contains information that Microsoft designated as “Highly Confidential – Attorney’s Eyes Only”
2 during discovery.

3 4. Counsel for Valve reached out to me after Valve filed its Motion to Seal and
4 provided a table of references to confidential Microsoft information that was used as part of the
5 summary judgment briefing in the above-captioned matter. Microsoft was not provided copies of
6 the underlying reports, so it is unable to determine whether additional confidential Microsoft
7 information is at issue in those reports. Microsoft relied on the table provided by Valve to
8 determine what of Microsoft’s information, if any, should be kept under seal.

9 5. On August 20, 2025, I met and conferred by email with Plaintiffs’ and Valve’s
10 counsel to discuss this information. Counsel for Plaintiffs and Valve confirmed that the parties do
11 not oppose Microsoft’s request to keep its confidential information sealed, as reflected by the
12 bolded text in Exhibit A to the Second Declaration of Adam Fossa dated August 20, 2025,
13 concurrently filed.

14 I declare under the penalty of perjury of the laws of the United States of America that the
15 foregoing is true and correct.

16 Executed this 22nd day of August, 2025 in Seattle, Washington.

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18 /s/ Cara Wallace
19 Cara Wallace
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